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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

BO AVERY, PHOEBE RODGERS, KRISTY  
 CAMILLERI AND JILL UNVERFERTH,  
 individually and on behalf of all others similarly  
 situated,

Plaintiffs,

v.

TEKSYSTEMS, INC.,

Defendant.

Case No. 3:22-cv-02733-JSC

**PLAINTIFFS’ MOTION FOR LEAVE  
 TO FILE PLAINTIFFS’ RESPONSES  
 TO DEFENDANT’S OBJECTIONS TO  
 THE DECLARATION OF SALLY J.  
 ABRAHAMSON IN SUPPORT OF  
 PLAINTIFFS’ REPLY IN SUPPORT  
 OF MOTION FOR PARTIAL  
 SUMMARY JUDGMENT**

Judge: Hon. Jacqueline Scott Corley

Pursuant to Civil Local Rules 7-3(d) and 7-11, Plaintiffs seek leave to file Plaintiffs’ Responses to Defendant’s Objections to the Declaration of Sally J. Abrahamson in Support of Plaintiffs’ Reply in Support of Motion for Partial Summary Judgment (“Responses”). The proposed Responses are attached hereto as **Exhibit A**.

Good cause exists to grant this request for leave. Plaintiffs’ Responses to Defendant’s Objections identify specific testimony already in the record that demonstrates that Plaintiffs’

evidence in support of their Reply in Support of Partial Motion for Summary Judgment does not contradict prior testimony or misstate testimony, and is otherwise not objectionable.

Civil Local Rule 7-3(d) states in relevant part that “[o]nce a reply is filed, no additional memoranda, papers, or letters may be filed without prior Court approval, except . . . if new evidence has been submitted in the reply, the opposing party may file and serve an Objection to Reply Evidence . . .” Therefore, Plaintiffs require leave of this Court to file their Responses to Defendant’s Objections, and a stipulation could not be obtained pursuant to Civil Local Rule 7-12. *See Declaration of Sally J. Abrahamson in Support of Plaintiffs’ Motion for Leave to File Plaintiffs’ Responses to Defendant’s Objections to the Declaration of Sally J. Abrahamson in Support of Plaintiffs’ Reply in Support of Motion for Partial Summary Judgment at ¶ 2.*

For all the reasons stated above, Plaintiffs respectfully request that the Court grant leave to file Plaintiffs’ Responses to Defendant’s Objections to the Declaration of Sally J. Abrahamson in Support of Plaintiffs’ Reply in Support of Motion for Partial Summary Judgment.

Dated: August 9, 2024

Respectfully submitted,

/s/ Sally J. Abrahamson

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